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September 21, 2006

John MacLeod, Chairman
Occupational Safety & Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

RECEIVED

FEB 06 2007

STANDARDS BOARD

RE: Amending the Title 8 Code

Dear Mr. MacLeod:

I am writing on behalf of the Western Propane Gas Association to petition the Board to amend the Title 8 Code, Division 1, Chapter 4, Subchapter 1 of Section 480 (d)(5) to allow the use of multivalves on ASME underground containers.

We are asking for an emergency petition for this code change in order to make it consistent with the current edition of the National Fire Protection Association (NFPA) 58, *Liquefied Petroleum Gas Code 1998 Edition*. NFPA 58 specifies the codes, standards and recommended practices for the installation of LP-Gas Systems.

Multivalves are used on ASME propane containers designed to be installed underground. The valves and the containers conform to the specifications outlined in the NFPA 58 table 2-3.3.2(a) for "*Container Connections and Appurtenance Requirements for Containers Used on Commercial, Domestic, Industrial; Engine Fuel, and Over-the-Road Mobile Applications*".

For years the propane industry has installed this type of underground container at residential homes throughout the state. In recent months the propane industry has asked the Department of Industrial Relations (DIR) to approve the installation of these multivalve ASME underground tanks at commercial locations in order to comply with the set back requirements and because they provide an additional level of safety.

According to the DIR, such installations are not consistent with the state code, therefore we are petitioning the Standards Board to amend Title 8, as referenced above, to allow such installations.

Thank you for your consideration.

Sincerely,

Rob Scott
HazMat Director